

Message

From: Liz Hitchcock- Safer Chemicals [lizhitchcock@saferchemicals.org]
Sent: 11/6/2017 10:17:59 PM
To: Minoli, Kevin [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=c9c0070d651a4625ac20258369f9b050-KMINOLI]
CC: Beck, Nancy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=168ecb5184ac44de95a913297f353745-Beck, Nancy]; Reeder, John [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=aa56f6b0d507483fba530f3abbf6c94f-JREEDER]; OIG Hotline [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d5e42f152e2840aa9d1e8957da4e0b2e-OIG Hotline]; Fugh, Justina [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=54afbe2e36d3481c8c52d27ba3979d47-JFUGH]
Subject: Recusal of Dr. Nancy Beck from Proposed TSCA Rules
Attachments: SCHF TSCA 6a recusal letter 11052017.pdf

Kevin Minoli, Acting General Counsel and Ethics Officer

Office of General Counsel

Dear Mr. Minoli:

We are sending the attached letter to request the mandatory recusal of Dr. Nancy Beck, Deputy Assistant Administrator (DAA) for Chemical Safety and Pollution Prevention, from ongoing rulemakings under section 6(a) of TSCA to ban unsafe uses of three widely used chemicals – Trichloroethylene (TCE), Methylene Chloride (MC) and N-Methylpyrrolidone (NMP) (together, the “section 6(a) rulemakings”). Participation in these rulemakings violates federal conflict of interest and impartiality requirements, as illustrated by Dr. Beck’s troubling history as an advocate for chemical companies opposed to the proposed bans and the author of industry comments criticizing the EPA risk assessments on which the bans are based.

In summary, we request that you reconsider the June 8 impartiality determination as applied to the section 6(a) rulemakings or determine that the rulemakings are not subject to the determination. In either event, we ask you to conclude that Dr. Beck is recused from any further participation in the rulemaking process and to inform her of such determination as soon as possible.

Our groups look forward to your early response to this letter. Should you have any questions, please contact Bob Sussman, counsel for Safer Chemicals, Healthy Families, at bobsussman1@comcast.net.

Sincerely yours,

Liz Hitchcock, Government Affairs Director

Safer Chemicals Healthy Families

Eve Gartner, Staff Attorney

Earthjustice

Daniel Rosenberg, Senior Attorney

NRDC

Michael Belliveau, Executive Director

Environmental Health Strategy Center

cc: Dr. Nancy Beck

Ryan Jackson

Justina Fugh

Arthur Elkins (OIG)

Docket ID EPA-HQ-OPPT-2016-0231

Docket ID EPA-HQ-OPPT-2016-0387

Docket ID-EPA-HQ-OPPT-2016-0163

Liz Hitchcock, Government Affairs Director

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